

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DAVID FLYNN,

Plaintiff,

v.

MICHAEL J. WELCH, *et al.*,

Defendants.

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Civil Action Number: 1:21-cv-10256-IT

JOINT STATEMENT

Pursuant to Local Rule 16.1(d) and this Court's March 18, 2021 order, Plaintiff David Flynn and Defendants Michael J. Welch, Jim Forrest, and Stephen Traister submit the following:

1. The parties do not consent to a trial by magistrate.
2. There are no pending motions.
3. The parties propose the following discovery deadlines:
 - a. Initial disclosures must be completed by May 15, 2021;
 - b. Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after May 15, 2021;
 - c. All requests for production of documents and interrogatories must be served by December 3, 2021;
 - d. All requests for admission must be served by December 3, 2021;
 - e. All depositions, other than expert depositions, must be completed by December 3, 2021;
 - f. All discovery, other than expert discovery, must be completed by December 3, 2021;
 - g. Plaintiff's trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed by, December 31, 2021;

- h. Plaintiff's trial experts must be deposed by January 28, 2022;
- i. Defendants' trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by January 28, 2022;
- j. Defendants' trial experts must be deposed by February 25, 2022

4. The parties propose that motions for summary judgment or partial summary judgment must be filed by March 25, 2022. The only matter that needs to be discussed at the scheduling conference is, if Defendants move for dismissal on qualified immunity grounds, whether it should be briefed prior to the parties filing dispositive motions, if any, on the merits or whether it should be part of any motion for summary judgment or partial summary judgment filed by Defendants.

5. Local Rule 16.1(d)(3) certifications will be filed by each party under separate cover.

Dated: April 8, 2021

Respectfully submitted,

/s/ Michael Bekesha
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Counsel for Defendants

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 8, 2021.

/s/ Michael Bekesha